



**National
Urban League**

*Empowering Communities.
Changing Lives.
For An Equitable Future.*

Marc H. Morial
President & CEO

80 Pine Street, 9th Floor
New York, NY 10005
Phone 212 558 5336

www.nul.org
presidentoffice@nul.org

**National Urban League Public Comments on Priority Census Concerns
on Behalf of the Census Black Roundtable at the
Meeting of the U.S. Census National Advisory Committee on
Racial, Ethnic and Other Populations
May 5-6, 2022**

**Demographic And Housing Characteristics File/ Detailed Demographic and
Housing Characteristics File**

The U.S. Census Bureau's recent announcement delaying the release date for the next set of 2020 Census data products, including the Demographic Profile, the Demographic Housing *and* the *Detailed* Demographic Housing Characteristics Files (DHC/ DDHC) to May 2023--a full three years after the 2020 Census, is troubling on several fronts. While we applaud the Census Bureau's plan to release an unprecedented amount of detailed information on diverse population groups, data quality concerns are heightened given the lengthy delay in releasing this data.

Specifically, the prolonged timeframe in which government leaders and policymakers must rely on old data (2010 Census) for decision-making and resource allocation raises questions about fairness and equity. Populations that have been counted well in the previous census may fare better than those who were not, with respect to these resource allocations. Decisionmakers do not have an accurate profile of their communities and won't know for an additional year how their communities have changed between 2010 and 2020. The extensive delay in publishing detailed 2020 demographic and housing characteristics hurts federal programs, researchers, and policymakers' ability to make timely assessments of health disparities among groups and assess other federal, state, local and tribal program needs.

In addition, what are the implications, if any, for Census Bureau staff who must rely on dated information from 2010 to develop frames and modeling for other Census surveys conducted this year? Are these data good enough for the Census Bureau's own survey and methodological needs until the data are released next year or later?



Detailed Demographic and Housing Characteristics data (Detailed DHC) will now be released as three separate products, with the first product scheduled for release in August 2023 and the schedules for the remaining products still being determined. This adds another layer of uncertainty for decisionmakers. The Census Bureau must continue to engage state and local officials, data users and stakeholders to increase transparency on these issues and restore faith in Census data products and the decennial process. Today's NAC meeting will facilitate this need.

Applying Blended Base Data to improve Population Estimates to Address the Undercount

The National Urban League is encouraged by and supports the Census Bureau's efforts to leverage data from other 2020 Census data (Demographic Analysis and older 2020 estimates), to address gaps and shortcomings in the 2020 Census count—blending data sets to offset undercounts. Census staff have been helpful explaining to stakeholders, the opportunities for using blended data, particularly for improving the count of older children. We do not know, however, if blended data will improve the undercount for race and ethnic populations nor whether it will decrease data accuracy for these groups, pending the 2020 blended data source.

If the quality of the data upon which blended data are based is not good, then the outcome and potential benefit of blended data for undercounted populations are questionable. Because of its promise as a potential “fix” to improve annual Population Estimates to address the loss of billions of dollars in federal funding for undercounted populations, the National Urban League encourages more transparency and dialogue with stakeholders on exactly what data sets will be used to develop the blended base and the implications for Black and other undercounted populations. 2020 Census undercounted communities need viable options to address this need.

Census staff, to date have been helpful introducing the concept of blended data to stakeholders. Timely, continued engagement on the opportunities, implications and limitations of blended base data would be useful in helping stakeholders embrace this option to improve Population estimates used for federal funding allocations. Linking surveys, might indeed help improve the coverage and completeness of Census data –*if* these data are fit, useful, and good (complete), for undercounted race and ethnic populations. The National Urban League supports the Census



Bureau's efforts to explore feasible options to improve 2020 Census data using blended data and/ or other means under the right circumstances.

Race and Ethnicity

Improving the ability of *all* populations to see themselves in the Census question on race and ethnicity should increase data accuracy and self-identification. The National Urban League supports Census efforts to optimize responses to the race and Hispanic origin question *in an equitable manner*. We do not, however, support the diminution of the race category in any way, nor the adoption of "improvements" to the race and/ or Hispanic origin question which ignore the reality of this country's long history of racial disparities and discrimination toward Black, Indigenous, and other populations.

The explicit collection of data on race and ethnicity, informs meaningful efforts and mandates to further racial justice, monitor, and enforce civil rights laws. Without accurate race data from the decennial census questionnaire (not the American Community Survey), civil rights enforcement for Black and other populations would be compromised and fall short of Constitutional protections. The National Urban League does not support any potential efforts to minimize or remove the race question from the decennial Census questionnaire to "improve" the overall race and/ or Hispanic origin question.

2030 Research Priorities—Undercounted Black Men, Residence Rules

As the Census Bureau has begun organizing staff resources to design, plan and transform the next census, the National Urban League implores the agency to prioritize *eliminating the differential undercount* as a 2030 research priority—particularly for Black men who are undercounted in greater numbers with each census. To date, the National Urban League is unaware of any effort within the history of the Census Bureau to address the Black undercount, particularly the alarming undercount of Black men across all age groups.

By contrast, in 2020, the Census Bureau's efforts to improve the count of young children was a necessary, comprehensive, Bureau-wide priority. Internal teams were developed, 2020 Census questionnaires were redesigned, special instructions for enumerators were developed to ensure young children were counted.



Enumerator training included instructions to ensure the complete count of children, and 2020 Census Call Centers operators and/ or Field staff had special instructions to make follow-up calls to respondents to inquire whether every child in the household had been counted and not left out.

A recent paper sponsored by the Leadership Conference on Civil and Human Rights stated: “Prior to 2011, the Census Bureau had given limited attention to the issue of counting young children in the decennial census. Despite the availability of data showing young children as having a relatively high net undercount since the 1990 Census, the 2010 Census included no specific efforts to improve the coverage of young children, gather data about the children most at risk, or to research reasons for this problem.” The report further states:

- “Nonetheless, the changes in attention to this issue and the honest commitment on the part of the Census Bureau to address this problem is an important change in 2020 compared with 2010. There are many lessons learned from the experience between 2010 and 2020 that the Census Bureau and external advocates can use to improve their approach to the 2030 Census. “(Counting Young Children in the U.S. Census – Important Differences Between 2010 and 2020.” by Deborah H. Griffin and William P. O’Hare. March 29, 2022. [https:// civilrightsdocs.info/ pdf/ reports/ Counting-Young-Children-in-the-Census-Report.pdf](https://civilrightsdocs.info/pdf/reports/Counting-Young-Children-in-the-Census-Report.pdf))

Despite the Census Bureau’s comprehensive investment, in counting young children, their 2020 Census undercount was larger than the preceding census in 2010. It is worth noting, however, that the 2020 Census net undercount of young children did not increase as much as the net undercount for African Americans and Latinos. The National Urban League continues to support comprehensive efforts to accurately count young children between 0-4, as Black and Brown children are disproportionately undercounted each decade. We understand, however that counting the parents, particularly Black men who have an entire life cycle of being either missed entirely (omitted), from the census or undercounted, must be prioritized and taken more seriously by the Census Bureau in the 2030 Census. The Census Bureau must do more to eliminate the differential undercount of race and ethnic populations—especially Black men.



Residence rules

2020 Census residence criteria continued the Census Bureau's practice of counting incarcerated individuals at the location of their prisons rather than at their last home address, thereby depriving Black and Brown populations (who are disproportionately incarcerated), of an accurate census count, political representation, and critical funding for their home communities. The Census Bureau must end this systemic practice of disenfranchising communities of color by artificially inflating the population count of distant more privileged communities, with prisons. Further, the National Urban League urges the Census Bureau to initiate plans to address this issue early in the decade and is committed to helping the Census Bureau accomplish this objective in the months ahead.

Administrative Records

Using administrative records (AdRecs), to enumerate nonresponding households was a sea change for the 2020 Census that helped make the census more efficient and complete, during the global pandemic that impaired the Census Bureau's ability to fully conduct the Census. Admittedly, administrative records (AdRecs) help the Census Bureau more accurately identify and count households that it would otherwise miss in the census. These data (high quality administrative records) must and will play an increasingly larger role in the upcoming 2030 Census given failing response rates across Census surveys. The National Urban League cautions wholesale use of Administrative Records in undercounted communities as a default enumeration method, however.

The full implication of increased use of AdRecs is still unclear. How accurate, consistent, and reliable are these data for diverse populations? How do AdRecs affect civil rights enforcement and voting rights? How complete and representative are undercounted race and ethnic populations in administrative records—particularly IRS records, and other governmental data? The National Urban League acknowledges the importance of utilizing administrative records as an enumeration tool to ensure a complete count. However, the disproportionate and wholesale use of AdRecs to count vulnerable populations creates a second-class citizen approach to counting diverse race and ethnic populations.

What assumptions about accuracy have been made regarding AdRecs? What are the costs, risks, and benefits of this approach? Vulnerable communities like the homeless, undocumented immigrants, formerly incarcerated people and the highly



mobile do not routinely interact with society's public institutions and thus, are less likely to be represented in administrative records. The National Urban League urges both caution and additional research to determine how AdRecs can be leveraged *equitably* and layered with other methodological and outreach strategies to improve the Census count of nonresponding households.

Advisory Committees

The National Urban League has been informed by the Census Bureau that the NAC will no longer seat organizations as members on this Advisory Committee (only individuals) and will instead channel National organizations to its newly created, Office of Strategic Alliance to address their concerns. The National Urban League, a recent member of the NAC, believes this is a flawed decision, particularly under the current construct of the 2–3 person office and the lack of adequate staffing. Further, shuttling national organizations to this office does not provide these organizations with a process nor the ability to engage the Census Bureau in a formal, structured setting with other diverse organizations in an advisory capacity. The National Urban League strongly recommends the establishment of a 2030 Census Advisory Committee comprised of diverse national organizations reflecting a broad range of census interests and needs, i.e., immigrants and foreign born, race and ethnicity, technology, privacy, state and local government, data users, civil rights organizations, demographic and statistical interests, youth, third-party data entities, and the like. The Census Bureau is encouraged to move quickly to establish a 2030 Census Advisory Committee as 2030 planning will soon begin in earnest, three years now into the decade.

A 21st Century Census Curated Data Enterprise: A Bold New Approach to Create Official Statistics/ Spring 2022 Report

According to this recent report, the Sloan Foundation, and the Census Bureau, “Curated Data Enterprise” concepts with a diverse set of Census stakeholders, including researchers, economic developers, economists and business leaders, advocates, public policy analysts, and applied demographers, etc., to develop concepts for transforming the 2030 Census and “producing more timely, robust, and accurate findings to more fully reflect the diversity of the nation’s racial and ethnic composition.” The National Urban League recommends more transparency and dialogue with stakeholders representing undercounted populations on this effort. Moreover, Census should inform its advisors and stakeholders how these



**National
Urban League**

efforts mesh with its own diversity and inclusion efforts and internal 2030 Census transformation teams and leadership currently being established. Finally, more cost-based data are needed so that stakeholders, advocates, and appropriators understand how the Census Bureau is prioritizing findings from this Curated Data Enterprise experiment.



Marc H. Morial
President and Chief Executive Officer
National Urban League